

EXHIBIT 1

Samson 30(b)(6) Notice: Areas of Inquiry

(1) For the period October 1, 1995, through September 30, 1997:

(a) all data, electronically or digitally recorded information, documents or records of any nature which were created, delivered, received, stored compiled, or maintained, and which, in the ordinary course, should have been created, delivered, received, stored and/or maintained, by or on behalf of the United States Government, pertaining or relating to the transportation of military or military sponsored cargo transported within the Defense Transportation System to or from NAF Adak and points in the continental United States, either directly or by transshipment, including, without limitation: any and all data, data compilations or summaries, electronically or digitally stored information, communications, correspondence, electronic mail, message traffic, documents or records, including (without limitation) those reflecting, relating or referring to review, consideration, discussion, designation, justification, selection and/or approval by Government personnel of the particular mode of transportation of any and all such cargo (e.g., air or ocean, and/or via military or civilian-owned or controlled aircraft or vessels); the criteria applied and information considered by such personnel in selecting such transportation mode; and TCMD records, cargo manifests, bills of lading, descriptions of cargoes, and weights of cargo, and all communications and memoranda pertaining to such cargo;

(b) the decisions, deliberations, orders, directions, actions, rules, protocols, policies, practices and procedures of the United States Government pertaining or relating to selection of the particular modes of transportation of any and all such cargo (e.g., air or surface, and transport via military vs. civilian assets), including (without limitation) the

extent to which the same were or were not consistent with past decisions, actions, practices and procedures during the period between January 1, 1993 and September 30, 1997;

(c) the criteria applied and information considered by such personnel in selecting such transportation modes;

(d) any relationship between the Government's selection of the mode(s) of transportation for such cargo, and the planning and implementation of the closing of NAF Adak; and

(e) the identity and current whereabouts of all Government personnel who were involved or participated in such transportation mode selection decisions and in implementing them, and of all other persons with knowledge of any of the foregoing.

(2) For the period October 1, 1995, through September 30, 1997:

(a) all data, electronically or digitally recorded information, documents or records of any nature which were created, delivered, received, stored, compiled and/or maintained, and which, in the ordinary course, should have been created, delivered, received, stored, compiled and/or maintained, by or on behalf of the United States Government, pertaining or relating to the transportation of military or military sponsored cargo transported by either civilian or military aircraft to or from NAF Adak and points in the continental United States, either directly or by transshipment, including, without limitation, any and all TCMD records, cargo manifests, descriptions of cargoes, and weights of cargo, and data, data compilations electronically or digitally recorded information, correspondence, communications, electronic mail, message traffic,